

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

)
IAN J. BROWN, JAMES BROWN,)
and BARBARA BROWN,)
)
Plaintiffs,)
) C.A. No. 04cv11924-RGS
v.)
)
UNITED STATES OF AMERICA,)
VERIZON NEW ENGLAND, INC.,)
and BOSTON EDISON COMPANY)
d/b/a/ NSTAR ELECTRIC,)
)
Defendants.)
)

**UNITED STATES OF AMERICA'S MOTION FOR LEAVE TO FILE REPLY
MEMORANDUM IN SUPPORT OF ITS MOTION TO DISMISS**

Defendant, the United States of America, in the above-captioned action move for leave to file a brief reply memorandum in support of its Motion to Dismiss. The government believes that the brief memorandum clarifies the issues before the Court and will assist it in reaching a decision on the Motion to Dismiss.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Damian W. Wilmot
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Dated: January 28, 2005

CERTIFICATION UNDER L.R. 7.1

I certify that in accordance with Local Rule 7.1, I attempted to contact Plaintiffs' counsel for his consent or objection to my filing of this Reply Memorandum, but was unsuccessful.

/s/ Damian W. Wilmot
DAMIAN W. WILMOT
Assistant U.S. Attorney